

REMARKS/ARGUMENTS

Reconsideration and allowance of this application are respectfully requested.

Currently, claims 1-20 are pending in this application.

Objections to the Disclosure:

The disclosure was objected to because appropriate section headings were allegedly missing. By this Amendment, the section heading "BRIEF DESCRIPTION OF EXEMPLARY EMBODIMENTS" has been added.

The disclosure was also objected to for allegedly including an embedded hyperlink and/or other form of browser-executable code. While Applicant submits that the recitation of "www.eil.utoronto.ca/iscm-descr.html" is not browser-executable code (note the previous amendment deleting "http://"), Applicant has further editorially amended this recitation to even further clarify that it is not browser-executable code. That is, the recitation of "eil.utoronto.ca/iscm-descr.html" does not form browser-executable code.

Applicant therefore respectfully requests that the objections to the disclosure be withdrawn.

Rejection Under 35 U.S.C. §102:

Claims 1-14 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Gryphon et al (U.S. '537, hereinafter "Gryphon"). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Each element of the claimed invention is not found in Gryphon. For example, Gryphon fails to disclose searching a generic

process plan for a predetermined pattern contained in a non-generic process element and inserting content from the non-generic process element into the generic process plan on detection of the predetermined pattern to generate a process plan, wherein the instructions for inserting content are coded into the non-generic process element, as required by claims 1-20.

Page 5, lines 8-9 and pages 11-12 of the Office Action allege that col. 6, lines 1-20, col. 6, lines 47-67 and col. 7, lines 1-57 of Gryphon disclose the above-noted limitation. Applicant respectfully disagrees with this allegation.

The bottom of page 11 of the Office Action states “‘Action’ is interpreted as a non-generic process element, where ‘Action’ is associated with ‘Step’. A generic process plan is defined as a sequence of Steps....” Even assuming *arguendo* that these interpretations are accepted, Gryphon fails to disclose the above noted limitations.

In particular, Gryphon fails to disclose searching a generic process plan for a predetermined pattern contained by at least one non-generic process element. For example, Gryphon fails to disclose searching a sequence of steps (the alleged “generic process plan”), let alone searching the sequence of steps for a predetermined pattern contained by an action (the alleged “non-generic process element”).

Moreover, Gryphon fails to further disclose inserting content from the non-generic process element into the generic process plan to generate a process plan on detection of the predetermined pattern. In particular, Gryphon fails to disclose inserting content from an action (the alleged “non-generic process element”) into the sequence of steps (the alleged “generic process plan”) to generate a process plan on detection of a predetermined pattern contained by the action.

Even further, Gryphon fails to further disclose instructions for the insertion of the content being coded into the non-generic process element. For example, Gryphon fails to disclose instructions for content insertion being coded into the action (the alleged “non-generic process element”).

If the Examiner maintains the rejection in view of Gryphon, Applicant respectfully requests that the next Office Action specifically identify what portion of Gryphon discloses the above noted features. For example, what col. and line number(s) and/or what Figure(s) discloses searching a sequence of steps (the alleged “generic process plan”) for a predetermined pattern contained by an action (the alleged “non-generic process element”). Applicant submits that there is absolutely no teaching in Gryphon of applying a search process to the sequence of steps disclosed by Gryphon in order to find a predetermined pattern which is contained in an action of Gryphon.

The above cited portions of Gryphon merely disclose providing a pictorial set of symbols and recording them (even on paper) to characterize a business process which is being analyzed. Actions that are defined are merely associated with certain steps. (See col. 7, lines 50-52 stating “In stage 637, the Actions defined in stage 633 are associated to the steps defined in stage 610.”). Merely associating actions to particular steps does not in any way disclose searching a generic process plan for a predetermined pattern contained by a non-generic process element, and inserting content from the non-generic process element into the generic process plan to generate a process plan upon detection of the predetermined pattern.

Dependent claim 3 further requires each stored generic process plan being indexed in accordance with a goal to be achieved by the plan and selecting a generic process plan for searching in accordance with a received goal input. Page 6, lines 1-4 of

the Office Action alleges that col. 6, lines 1-14 of Gryphon discloses these claimed features. Applicant respectfully disagrees. Col. 6, lines 1-14 of Gryphon states the following:

“Action

An Action symbol 156 represents how work is done whereas Step information indicates when and under what conditions the work is performed within a process. An Action is a bridge between business and program logic. Actions perform work while Steps coordinate the actions. An Action can also be composed of lower-level Actions that provide increased detail of exactly how the work is to be performed.

Actions can be essential actions that are predefined as constant components of Visual BML or they can be compound actions that are created by the user.

Examples of an Action would be ‘Retrieve Customer Information’ or ‘Assign Call to Support Queue’.”

There is absolutely no teaching of each stored generic plan being indexed in accordance with a goal to be achieved. Nor is there any disclosure in the above portion of Gryphon regarding receiving a goal input, let alone selecting a generic process plan for searching in accordance with the received goal input.

With respect to dependent claims 5 and 7, Applicant submits that Gryphon fails to disclose the indexing as claimed. The Office Action apparently alleges that col. 6, lines 56-66 of Gryphon discloses the features in claim 5 or claim 7. Applicant respectfully disagrees. Col. 6, lines 56-66 of Gryphon states the following:

“For each of the Steps defined in FIG. 2, a more detailed analysis (involving more low-level Steps) needs to be performed. For the purposes of this example, we take ‘Identify Customer’ Step 230 and examine it further. On another sheet of paper (FIG. 3) place ‘Identify Customer’ Step 310 at the top left hand corner. In our process, searching in the customer database for their names (sub Step 320) identifies callers. If that fails, a search is performed by the company name (sub Step 340), and it is determined if the caller appears on the valid contact list.”

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As can plainly be seen, the above cited portion of Gryphon fails to disclose the indexing required by claim 5 or claim 7.

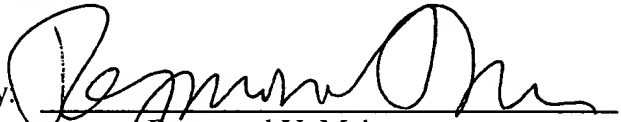
Accordingly, Applicant respectfully submits that claims 1-20 are not anticipated by Gryphon and respectfully requests that the rejection of these claims under 35 U.S.C. §102 be withdrawn.

Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

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